

EXHIBIT 13

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY
3 -----
4) IN RE JOHNSON & JOHNSON)
5) TALCUM POWDER PRODUCTS) MDL NO.
6) MARKETING, SALES PRACTICES,) 16-2738 (FLW) (LHG)
7) AND PRODUCTS LIABILITY)
8) LITIGATION)
9) -----

10 IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
11 STATE OF MISSOURI
12) VALERIE SWANN,)
13))
14) Plaintiff,)
15))
16) Cause No.
17) v.) 1422-CC09326-03
18))
19) JOHNSON & JOHNSON, et al.,)
20))
21) Defendants.)
22) -----

23) -----
24) Tuesday, September 14, 2021
25) -----

26 Oral Deposition of JUDITH WOLF, M.D.,
27 VOLUME 2, held at the Fairmont Hotel, 101 Red
28 River Street, Austin, Texas, commencing at
29 8:53 a.m. CDT, on the above date, before
30 Michael E. Miller, Fellow of the Academy of
31 Professional Reporters, Certified Court
32 Reporter, Registered Diplomate Reporter,
33 Certified Realtime Reporter and Notary
34 Public.

35) -----
36) GOLKOW LITIGATION SERVICES
37) 877.370.DEPS | fax 917.591.5672
38) deps@golkow.com

1 A. I don't think there's anything
2 else in her history that I identified.

3 Smoking would be mucinous
4 cancer, and she did not have mucinous cancer.

5 Q. In Ms. Bondurant's case and in
6 any case, we have the possibility of factors
7 that are, as of now, unknown, correct?
8 That's true for any --

9 A. All cancers, yeah.

10 Q. Okay. I asked you this
11 yesterday and I don't think we ever reached
12 an agreement, but new question.

13 In Ms. Bondurant's case, are
14 you able to ascribe a percentage that talc
15 caused her ovarian cancer as compared to a
16 percentage that family history caused her
17 ovarian cancer as compared to a percentage
18 that endometriosis caused her ovarian cancer?

19 DR. THOMPSON: Object to form.

20 A. I don't know how I would
21 ever -- I don't know how to answer that
22 question because I don't think of it as a
23 percentage.

24 Are you -- so I guess I'm still
25 not understanding your question.

1 powder use has not been found to be
2 associated with a confounder in the 40 years
3 since -- nearly 40 years since it's been
4 found to be associated with ovarian cancer.

5 Q. All right. It's possible, but
6 in your opinion unlikely, that Ms. Bondurant
7 could have gotten her ovarian cancer because
8 of a cause that science has yet to discover.

9 Is that a good summary of your
10 opinion --

11 DR. THOMPSON: Object to form.

12 BY MR. ZELLERS:

13 Q. -- on that point?

14 A. No. On the point of
15 confounding, my point is that as long as
16 we've known of the association between
17 genital powder use and ovarian cancer, there
18 have not been found any confounders that
19 would be the cause versus the genital talcum
20 powder use.

21 Q. And I'm going to step beyond
22 that.

23 A. Okay.

24 Q. We've acknowledged and we've
25 discussed that there may be unknown causes of

1 ovarian cancer, correct?

2 A. Yes.

3 Q. And you acknowledge in any
4 woman's case it's possible that their ovarian
5 cancer is caused by an unknown or
6 undiscovered cause, but you believe in
7 Ms. Bondurant's case the likely cause is her
8 talcum powder use?

9 DR. THOMPSON: Object to form.

10 A. That a cause of her cancer is
11 talcum powder use.

12 BY MR. ZELLERS:

13 Q. The route of talcum powder
14 exposure in Ms. Bondurant's case was through
15 migration, correct?

16 A. Yes.

17 Q. You believe that her ovarian
18 cancer was caused from talcum powder
19 traveling to her ovary -- well, strike that.

20 We talked yesterday about
21 inhalation with Ms. Gallardo. Same question
22 with Ms. Bondurant.

23 Do you believe that her ovarian
24 cancer was caused from talcum powder
25 traveling to her ovaries through inhalation?

1 Q. In Ms. Judkins' case, as in
2 each of the cases we've discussed, there's
3 the potential for unknown causes of ovarian
4 cancer. But in your view, talcum powder use
5 is a cause of her ovarian cancer, correct?

6 DR. THOMPSON: Object to form.

7 A. In my view, after review of all
8 her medical records and her depositions and
9 her forms, that talcum powder is a cause of
10 her ovarian cancer -- her talcum powder use.

11 BY MR. ZELLERS:

12 Q. All of the questions that I've
13 asked you in the past as to whether you have
14 individual opinions about asbestos or heavy
15 metals or fragrances that may be contained in
16 the talc, your opinion in this case is not as
17 to those specific ingredients, but it's to
18 the ingredients as a whole, the talc, which,
19 in your opinion, in this case caused
20 Ms. Judkins' ovarian cancer, correct?

21 DR. THOMPSON: Object to form,
22 misstates her testimony.

23 A. So it's the talc which contains
24 or had been found to contain asbestos talc
25 fibers, the heavy metals, nickel, chromium,

1 cobalt that we've talked about, and some
2 irritating fragrance ingredients.

3 BY MR. ZELLERS:

4 Q. Once again, we have no evidence
5 in Ms. Judkins' case of any samples of the
6 talcum powder she used that you're aware of;
7 is that right?

8 A. I'm not aware that we have any
9 of the samples of her baby powder that she
10 used.

11 Q. You have not communicated or
12 talked with Ms. Judkins; is that right?

13 A. I actually was on a phone call
14 with Ms. Judkins one time.

15 Q. When was that?

16 A. About a year and a half ago.
17 It was sometime deep in the pandemic, so...

18 Q. And for how long did the phone
19 call last?

20 A. It was with attorneys. I don't
21 remember how long the phone call was. Maybe
22 30, 40 minutes.

23 Q. And what was the purpose of the
24 phone call?

25 DR. THOMPSON: And I think that